

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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**UNITED STATES OF AMERICA**

**v.**

**COLLEEN FORDHAM**

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**1:21-cr-00041-02-JL**

**MOTION TO DISMISS INDICTMENT**

Colleen Fordham was charged by indictment with (1) a conspiracy to participate in an unlicensed money transmitting business in violation of Title 18, United States Code, Sections 371, 1960(a), and 1960(b)(1)(B); (2) a conspiracy to commit wire fraud in violation of Title 18, United States Code, Sections 1343 and 1349; and (3) wire fraud, in violation of Title 18, United States Code, Section 1343. The government hereby moves to dismiss the indictment, ECF No. 1, as to Colleen Fordham. The defendant assents to this motion.

Respectfully submitted,

John J. Farley  
United States Attorney

April 26, 2022

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